

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

Civil Action No. 15-10628-RWZ

CHRISTINA CORDA,	)
Plaintiff	)
	)
v.	)
	)
SUFFOLK COUNTY DISTRICT	)
ATTORNEY'S OFFICE,	)
Defendant	)

**PLAINTIFF'S EMERGENCY MOTION FOR EXTENSION OF TIME**

Plaintiff Christina Corda moves a one-week extension to provide further documents in response to the Court's Order of October 9, 2015 (ECF No. 25). As grounds for this motion, Ms. Corda states as follows.

1. On Friday, October 9, 2015, the Court entered an electronic order granting defendant's motion to compel further documents (ECF No. 18). Although the Court's order did not specify a time for producing further documents, the defendant's motion had requested an order that further documents be provided within 14 days. As a result, Ms. Corda understands that the deadline for responding is this coming Friday, October 23, 2015.
2. Ms. Corda's counsel began a jury trial this past Monday, October 19, 2015 (Lisandro v. Domino's Pizza, Inc., Civil Action No. 15-cv-1511584-WGY), and the jury charge and closing arguments are expected to occur on Friday, the same day Ms. Corda's further documents are due.
3. As a result of trial preparation last week and being engaged in trial this week, together with other scheduling complications created by the trial, Ms. Corda's counsel has not had sufficient time to attend to this issue. Ms. Corda's counsel had hoped to have time to

comply by the deadline and avoid having to file a motion with this Court, but the demands of trial have been greater than anticipated.

4. Pursuant to a joint motion of the parties, most discovery (including any further depositions) have been stayed pending a mediation currently scheduled for December 2, 2015, so the requested extension will result in no harm or prejudice to the defendant.

WHEREFORE, Ms. Corda respectfully requests that the deadline for providing further documents in compliance with the Court's order of October 9, 2015 be extended by one week, to October 30, 2015.

CHRISTINA CORDA

By her attorney,

/s/ Stephen Churchill

Stephen Churchill, BBO # 564158

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Dated: October 22, 2015

**CERTIFICATION PURSUANT TO LOCAL RULE 7.1**

I certify that I conferred with defendant's counsel in a good faith effort to narrow or eliminate any areas of disagreement with respect to the issues raised by this motion, without success. Specifically, counsel communicated about these issues via email on October 21, 2015 and October 22, 2015.

Dated: October 22, 2015

/s/ Stephen Churchill  
Stephen Churchill

**CERTIFICATE OF SERVICE**

I certify that I served, by the ECF system, a copy of the foregoing document on all counsel of record.

Dated: October 22, 2015

/s/ Stephen Churchill  
Stephen Churchill